

James A. Morris, Esq. (CSBN 296852)
jmorris@jamlawyers.com
Amy J. Anderson, Esq. (CSBN 301732)
aanderson@jamlawyers.com
MORRIS LAW FIRM
6310 San Vicente Blvd, Suite 360
Los Angeles, CA 90048
Tel: 323-302-9488
Fax: 323-931-4990

Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE BARD IVC FILTERS
PRODUCTS LIABILITY
LITIGATION

No. 2:15-md-2641-PHX

This Document Relates to:

**MOTION FOR EXTENSION OF
TIME TO COMPLETE PLAINTIFF
PROFILE FORM**

Jerry Jones v. C.R. Bard, Inc., et al.
No. 2:16-cv-01314-DGC

MAY IT PLEASE THE COURT:

In support of Plaintiff's Motion for Extension of Time to Complete the Plaintiff Profile Form in the above case, Plaintiff states the following:

FACTUAL BACKGROUND

1. Counsel for Plaintiff Jerry Jones filed his Bard IVC Short Form Complaint in the United States District Court for the District of Arizona on May 3, 2016.
2. Pursuant to Case Management Order No. 5, the Plaintiff Profile Form for Plaintiff is due July 2, 2016.
3. Plaintiff has completed and signed the Plaintiff Profile Form to the best of his ability without having access to his medical records. However, Plaintiff


1 is unable to fully and accurately respond to the entirety without those
2 medical records.

- 3 4. Plaintiff's counsel requested Plaintiff's medical records on or before March
4 10, 2016. Due to a number of issues with the facility, including various
5 HIPAA authorization problems, the records have still not been provided to
6 Plaintiff's counsel.
- 7 5. Plaintiff's medical record service has informed Plaintiff's counsel that these
8 record have been ordered and Plaintiff's counsel are only waiting for
9 delivery. However, Plaintiff's medical record service cannot provide any
10 approximate time for the delivery of these records.
- 11 6. Plaintiff and Plaintiff's counsel have made substantial good faith efforts to
12 acquire Plaintiff's medical records and the instant delay is due entirely to
13 circumstances outside of their control.
- 14

15 WHEREFORE, Plaintiffs request an extension of time of 60 days (until August
16 31, 2016) to complete the Plaintiff Profile Form.

17

18
19 RESPECTFULLY SUBMITTED this 13th day of July, 2016.

20
21 
22 James A. Morris, Esq. (CSBN 296852)
Amy J. Anderson, Esq. (CSBN 301732)
23 **MORRIS LAW FIRM**
6310 San Vicente Blvd, Suite 360
24 Los Angeles, CA 90048
Tel: 323-302-9488
25 Fax: 323-931-4990

26 Attorneys for Plaintiff

27

28

CERTIFICATE OF SERVICE

AND NOW, this 13th day of July, 2016, I, Carlos Lozano, hereby certify that I have served a true and correct copy of the foregoing document, **PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO COMPLETE PLAINTIFF PROFILE FORM** and **PROPOSED ORDER** via United States Mail as follows:

James R. Condo, Esq.
Amanda Sheridan, Esq.
SNELL & WILMER L.L.P.
One Arizona Center
400 E. Van Buren
Phoenix, AZ 85004-2204

Richard B. North Jr., Esq.
NELSON MULLINS RILEY & SCARBOROUGH, LLP
Atlantic Station
201 17th Street, NW Suite 1700
Atlanta, GA 30363

MORRIS LAW FIRM,

By: /s/  _____
Carlos Lozano
MORRIS LAW FIRM
6310 San Vicente Boulevard, Suite 360
Los Angeles, CA 90048
Phone: (323) 302-9488
clozano@jamlawyers.com